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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jessyca Goodman Garcia,

Plaintiff,

v.

Micah Gill, an individual; United States of
America; Malco Enterprises of Nevada, Inc.,
a domestic corporation d/b/a Budget Car
and Truck Rental of Las Vegas and/or
Budget Las Vegas; Does I through X,
inclusive; and Roe Business Entities XI
through XX, inclusive,

Defendants.

Case No. 2:21-cv-01308-RFB-VCF

Stipulation and Order

Plaintiff Jessyca Goodman Garcia (“Plaintiff”) and Defendants United States of
America and Micah Gill (collectively “Federal Defendants”) stipulate to, and request that
the Court issue an order approving, the following terms:

1. Micah Gill (“Gill”), individually, is dismissed as a defendant from this action
with prejudice;

2. Plaintiff shall not appeal the dismissal of Gill in case no A-18-778518-C
(Eighth Judicial District Court, Clark County, Nevada) (the “State Court Case”) or
otherwise seek to assert or re-assert against Gill any lawsuits, claims, causes of action,
proceedings, or demands for money or other relief for any acts or omissions arising out of
the events alleged in Plaintiff’s complaint in the State Court Case and/or alleged in
Plaintiff’s Complaint, ECF No. 1, in this federal action;

1 3. The Complaint's Third, Fourth and Fifth Causes of Action are dismissed
2 with prejudice as against Federal Defendants only;

3 4. Federal Defendants' Motion to Dismiss and Strike Portions of Complaint,
4 ECF No. 11, is withdrawn, and this moots the need for the Court to prepare for and
5 address such motion at the hearing scheduled for June 22, 2022, *see* ECF No. 23 (setting
6 two motions for hearing);

7 5. The United States will not file a dispositive motion on the grounds of time
8 bar/statute of limitations; and

9 6. The caption for this action shall be modified, for all future filings and papers
10 served, as shown on Exhibit A hereto to reflect that Gill is no longer a party to this action.

11 Respectfully submitted this 16th day of June 2022.

12 CHRISTIENSEN TRIAL LAWYERS

JASON M. FRIERSON
United States Attorney

13
14 /s/ Whitney J. Barrett

/s/ Patrick A. Rose

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17 *Attorneys for Plaintiff*

18
19 **IT IS SO ORDERED:**

20 

21 _____
22 **RICHARD F. BOULWARE, II**
23 **UNITED STATES DISTRICT JUDGE**

24 **DATED:** June 17, 2022